

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY
LITIGATION

CIVIL ACTION NO. 2-12-md-02327
MDL 2327

Judge Joseph R. Goodwin

This Document Applies To:

Deborah G. Davis v. Ethicon - 2:14-cv-29073

June Singh-Morgan v. Ethicon – 2:13-cv-14942

Fawn Walker v. Ethicon – 2:14-cv-29452

Ranesha Yisrael v. Ethicon – 2:15-cv-00619

Lori Young v. Ethicon – 2:13-cv-05685

Pamela Hanco v. Ethicon – 2:16-cv-01366

Sabrina Holder v. Ethicon – 2:13-cv-10518

Vicki Neitz v. Ethicon – 2:13-cv-14938

Janet Williams v. Ethicon – 2:13-cv-13463

**PLAINTIFFS’ RESPONSE TO DEFENDANTS’ MOTION FOR ORDER REGARDING
DISPOSITION OF NON-REVISION GYNECARE TVT PRODUCTS CASES**

NOW COME the above-referenced Plaintiffs, by and through the undersigned counsel, and in response to the motion of the Defendants, Ethicon, Inc. and Johnson & Johnson (“Ethicon”) regarding the disposition of non-revision Gynecare TVT Products Cases (ECF 5313) would show the Court the following:

On March 2, 2018, Ethicon filed Defendants’ Motion for Order Regarding Disposition of Non-Revision Gynecare TVT Products Cases (ECF 5313), which proposes a disposition of cases in which the plaintiff has not undergone a revision procedure. Accompanying the motion as Exhibit A is a list of cases that Ethicon maintains are cases in which the plaintiff has a Gynecare TVT

product implanted and has had no revision procedure performed.

The above-named plaintiffs are included in Ethicon's list of plaintiffs who have not undergone a revision procedure. In actuality, each of the above-named plaintiffs has undergone a revision procedure and is not properly included in Ethicon's motion. Plaintiffs' counsel has informed Ethicon that the above-named plaintiffs are not properly included in Defendants' motion pertaining to non-revision cases. Plaintiffs have made the revision records available to counsel for Defendants but are not attaching them here due to privacy requirements. Plaintiffs file this response to preserve their claims and avoid dismissal to the extent that Ethicon's motion is granted.

Dated: March 16, 2018

Respectfully submitted,

/s/Les Weisbrod

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on March 16, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/Les Weisbrod

LES WEISBROD